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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
January 2023 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JAIME TRAN,  
  
Defendant.

CR 2:23-cr-00098-GW  
  
I N D I C T M E N T  
  
[18 U.S.C. §§ 249(a)(1)(A),  
(B)(ii): Hate Crime; 18 U.S.C.  
§ 924(c)(1)(A)(iii): Using,  
Carrying, and Discharging a  
Firearm During and in Relation to  
a Crime of Violence; 18 U.S.C.  
§ 924(d) and 28 U.S.C. § 2461(c):  
Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

A. DEFENDANT'S HISTORY OF MAKING VIOLENT ANTISEMITIC THREATS

1. Beginning on a date unknown and continuing through at least February 16, 2023, defendant JAIME TRAN developed and espoused antisemitic beliefs and made violent threats towards individuals who actually were, and whom defendant TRAN perceived to be, Jewish.

2. For example, in 2018, defendant TRAN left dental school after making hate-filled statements about other students whom he

1 perceived to be Jewish, including referring to a person as a "Fucking  
2 little Jew boy."

3 3. Between August 2022 and December 2022, defendant TRAN's  
4 antisemitic statements escalated and included increasingly violent  
5 language.

6 4. For example, between August 2022 and December 2022,  
7 defendant TRAN repeatedly called and texted a former classmate with  
8 antisemitic and violent language, including messages that said:

9 a. "Someone is going to kill you, Jew. Someone is going  
10 to kill you, Jew. Someone is going to kill you, Jew. Someone is  
11 going to kill you, Jew."

12 b. "FUCK YOU JEW. Just kill yourself tonight you fucking  
13 Jew. I want you dead, Jew. Someone is going to kill you, Jew."

14 c. "Kill yourself you Jew."

15 d. "Cut your dick off and bleed to death you fucking  
16 Jew."

17 e. "Burn in an oven chamber you bitch Jew."

18 5. On or around November 25, 2022, defendant TRAN emailed  
19 approximately two dozen of his former classmates a flyer containing  
20 antisemitic propaganda, including the statement: "EVERY SINGLE ASPECT  
21 OF THE COVID AGENDA IS JEWISH."

22 6. In or around December 2022, defendant TRAN emailed dozens  
23 of his former classmates excerpts from a website describing "Persian  
24 Jew[s]" as "primitive," "narrow minded," and having "thick skulls."

25 B. DEFENDANT LOCATES AND ATTACKS TWO JEWISH VICTIMS

26 7. Victims A and B identify as Jewish and practice Judaism.  
27  
28

1           8.     Victims A and B attended religious services at Jewish  
2 synagogues in the Pico-Robertson neighborhood of Los Angeles County  
3 within the Central District of California.

4           9.     On or before February 15, 2023, defendant TRAN acquired at  
5 least two firearms, including: (1) a Kahr Arms, .380 caliber pistol,  
6 bearing serial number CAA1387; and (2) a Zastava, model M70, semi-  
7 automatic rifle, bearing serial number Z70-144818.

8           10.    On or about February 15, 2023, defendant TRAN used the  
9 internet to research locations with a "kosher market." Defendant  
10 TRAN planned to shoot someone in the area of a kosher market because  
11 he believed there would be "a lot of Jews there."

12           11.    Defendant TRAN then drove to the Pico-Robertson  
13 neighborhood of Los Angeles, California, and located Victim A, who  
14 was wearing a black jacket and a yarmulke. Defendant TRAN believed  
15 Victim A to be Jewish.

16           12.    On or about February 15, 2023, at approximately 9:45 a.m.,  
17 Victim A had just left religious services at a synagogue in the Pico-  
18 Robertson neighborhood of Los Angeles.

19           13.    As Victim A opened the door to Victim A's own car,  
20 defendant TRAN shot Victim A at close range in the back, intending to  
21 kill Victim A. Victim A was struck by the bullet but survived.  
22 Defendant TRAN then fled the scene in his car.

23           14.    On or about February 16, 2023, defendant TRAN returned to  
24 the Pico-Robertson area of Los Angeles, intending to kill another  
25 Jewish person.

26           15.    On or about February 16, 2023, at approximately 8:00 a.m.,  
27 Victim B had just left religious services at a synagogue in the Pico-  
28 Robertson neighborhood of Los Angeles.

1           16. On or about February 16, 2023, defendant TRAN located  
2 Victim B, who was wearing a dark-colored jacket and a yarmulke.  
3 Defendant TRAN believed Victim B to be Jewish.

4           17. On or about February 16, 2023, defendant TRAN shot Victim B  
5 at close range, intending to kill Victim B. Victim B was struck by  
6 the bullet but survived.

7           18. These Introductory Allegations are incorporated into each  
8 count of this Indictment.

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COUNT ONE

[18 U.S.C. §§ 249(a)(1)(A), (B)(ii)]

On or about February 15, 2023, in Los Angeles County, within the Central District of California, defendant JAIME TRAN willfully caused bodily injury to Victim A because of the actual and perceived race and religion of Victim A. The offense included an attempt to kill Victim A.

COUNT TWO

[18 U.S.C. §§ 249(a)(1)(A), (B)(ii)]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, defendant JAIME TRAN willfully caused bodily injury to Victim B because of the actual and perceived race and religion of Victim B. The offense included an attempt to kill Victim B.

COUNT THREE

[18 U.S.C. § 924(c)(1)(A)(iii)]

On or about February 15, 2023, in Los Angeles County, within the Central District of California, defendant JAIME TRAN knowingly used and carried a firearm during and in relation to a crime of violence, namely, a Hate Crime, in violation of Title 18, United States Code, Sections 249(a)(1)(A), (B)(ii), as charged in Count One of this Indictment, and in doing so discharged the firearm.

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COUNT FOUR

[18 U.S.C. § 924(c)(1)(A)(iii)]

On or about February 16, 2023, in Los Angeles County, within the Central District of California, defendant JAIME TRAN knowingly used and carried a firearm during and in relation to a crime of violence, namely, a Hate Crime, in violation of Title 18, United States Code, Sections 249(a)(1)(A), (B)(ii), as charged in Count Two of this Indictment, and in doing so discharged the firearm.

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FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 924(d)(1), and Title 28, United States  
7 Code, Section 2461(c), in the event of the defendant's conviction of  
8 the offenses set forth in any of Counts One through Four of this  
9 Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United  
11 States of America the following:

12 (a) All right, title, and interest in any firearm or ammunition  
13 involved in or used in any such offense; and

14 (b) To the extent such property is not available for forfeiture,  
15 a sum of money equal to the total value of the property described in  
16 subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p), as  
18 incorporated by Title 28, United States Code, Section 2461(c), the  
19 defendant, if so convicted, shall forfeit substitute property, up to  
20 the value of the property described in the preceding paragraph if, as  
21 the result of any act or omission of the defendant, the property  
22 described in the preceding paragraph or any portion thereof

23 (a) cannot be located upon the exercise of due diligence; (b) has  
24 been transferred, sold to, or deposited with a third party; (c) has  
25 been placed beyond the jurisdiction of the court; (d) has been

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